

AFFIDAVIT

I, Tosha Dennis, a Postal Inspector with the United States Postal Inspection Service, being duly sworn, deposes and states as follows:

1. I am employed as a United States Postal Inspector in Columbia, SC, and have been so employed since January 2002. I am sworn and empowered to investigate criminal activity involving or relating to the U.S. Postal Service. I am currently assigned to the Columbia Miscellaneous Team which investigates mail theft, burglaries, robberies, illegal narcotics, and other criminal activity involving U.S. mail employees and/or U.S. mail facilities. I have been trained and participated in investigations involving violations of federal law, including cases related to narcotics, assaults, robberies, burglaries, and other violent crimes.
2. For the purpose of supporting an application for a search warrant, I have set forth herein facts that I believe are sufficient to establish probable cause to believe that evidence of violations of Title 21, United States Code, Sections 841(a)(1) 846, and 843(b), are contained within one United States Express Mail parcel number EU 907132592 US hereinafter, the "subject parcel", the approximate dimensions are 16 inches in width, 12 inches in length and 8 ½ inches in height, weighing approximately 5 lbs and 3.3 oz. The subject parcel bears a U. S. Postal Express Mail label that is handwritten and is addressed to "Perez 1306 (1366) Porchers Bluff Rd Mt Pleasant SC 29466" and bears a return address of "C Turner 835 (885) OFarrell St #209 SF, CA 94102". The subject parcel is currently being held by your Affiant at the United States Postal Inspection Service at 1601 Assembly Street, Room 413, Columbia, SC 29201, within the District of South Carolina.

3. Based on my training and personal experience, as well as the experience of other Postal Inspectors who also specialize in investigations relating to the mailing of controlled substances and proceeds from the sale of controlled substances and with whom I have conferred, I am aware that the U. S. Postal Service's Express and Priority Mail services were developed primarily for business mailings. Business mailings usually bear typewritten or machine-printed labels, are in flat, letter-sized mailers, and are generally deposited in special U. S. Postal Service collection boxes each day. The U.S. Postal Service issues corporate charge accounts so that businesses may enter their account numbers on Express Mail labels to avoid time-consuming cash payments for each mailing. With account numbers listed on their Express mailings, business persons need not wait at post offices to mail overnight business communications.
4. I have learned through prior investigations and trafficking intelligence developed by myself and other Postal Inspectors that the U.S. Postal Service's Express and Priority Mail services are frequently used for shipping illegal proceeds and other mail matter. I also know from my training and experience the shippers of illegal proceeds prefer overnight/priority delivery services because of their speed, reliability and the ability to track the article's progress to the intended delivery point via the Internet. Your affiant also knows from training and experience that some traffickers prefer to use the United States Postal Service instead of private delivery services like Federal Express (FedEx), because private companies do not require search warrants to open parcels in their control.
5. On February 1, 2013, your Affiant was notified about Express Mail parcel

EU 907132592 US. The subject parcel was further identified based on

the following other factors:

- a. The Express Mail label is handwritten and does not appear to be related to a typical business mailing;
  - b. There is no record of the return address on the parcel of 835 or 885 OFarrel St #209 SF, CA 94102
  - c. The label is requesting a waiver of signature.
6. Your Affiant has reason to believe that the subject parcel contains narcotics/narcotics proceeds due to the aforementioned narcotic trafficking and proceeds indicators.
7. On February 1, 2013, your Affiant conducted an Accurint law enforcement database search (which has been utilized by and found to be reliable by your Affiant in the past) relative to the name and address of the purported sender of the parcel "C Turner 835 (885) OFarrel St #209, SF CA 94102" and no information could be found relative to the sender and the address. Therefore, based on your Affiant's training and experience, it is believed the sender's name is not associated with the address and the sender is attempting to hide his or her true identity.
8. Shortly after searching the law enforcement database on February 1, 2013, your Affiant contacted Canine Officer Frank Finch, Lexington County Multi-Agency Narcotics Enforcement Team, Lexington, SC. Your Affiant requested Officer Finch's assistance so that his certified narcotics Detection Dog, "Ben", could conduct an exterior examination of the aforementioned parcel. The subject parcel was placed individually among five other parcels. Your Affiant observed as "Ben" alerted in a positive manner to only this parcel and no other parcel, thus indicating the presence of the scent of a controlled substance emanating from the subject parcel. Officer Finch

confirmed to your Affiant that “Ben” has alerted for a controlled substance only on the subject and none of the other parcels in the array. Your Affiant observed “Ben” alert in a positive manner.

9. On February 1, 2013, Officer Finch advised your affiant that he has 6 years of experience as a narcotics detection dog handler and has been in law enforcement for 15 years. Officer Finch also informed your Affiant that “Ben” has been trained to detect the presence of the odor of ecstasy, marijuana, cocaine, cocaine base, methamphetamine, and heroin, and that “Ben” was last re-certified as a narcotic detection canine by the South Carolina Police K-9 Association, in April 2012, and is re-certified annually.
10. When considered together, these characteristics led your Affiant, based on my training and experience, to suspect that this parcel contains evidence of narcotics/ proceeds being mailed from California. Based on the facts set forth in this affidavit, and the experience and training of myself and other law enforcement officers, your Affiant submits that probable cause exists to believe that narcotics and/or narcotics proceeds are in United States Postal Service Express Mail parcel EU 907132592 US addressed to “Perez 1306 (1366) Porchers Bluff Rd Mt Pleasant, SC 29466”, with a return address of “C Turner 835 (885) OFarrel St #209 SF, CA 94102”.
9. Your Affiant believes the foregoing to be in violation of Title 21, United States Code, Sections 841(a) (1), 846, and 843(b) that is conspiracy to possess with intent to distribute a controlled substance, and illegal use of a communication facility. Your Affiant respectfully seeks the issuance of a Search Warrant directing the search of the subject parcel, any proceeds contained therein, and any enclosed material relating to

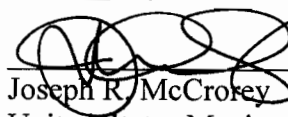
illegal proceeds. Based on my training and experience, contraband is often transported through the United States Mail, and correspondence, and other records relating to and the evidence of transporting illegal proceeds may be contained in the package suspected of proceeds.

10. Based on the above information, your Affiant believes and has probable cause to believe the subject parcel, EU 907132592 US having the approximate dimensions of 16 inches in width, 12 inches in length, and 8 ½ inches in depth, weighing approximately 5 lbs and 3.3 oz., contains fruits, instrumentalities and or evidence of a violation of Title 21, United States Code, Sections 841(a) (1), 846, and 843(b). The subject parcel has been maintained unopened, in the custody of your affiant pending the issuance of a Search Warrant.



Tosha Dennis  
Postal Inspector  
United States Postal Inspection Service

Sworn to and subscribed before me  
this 4<sup>th</sup> day of February 2013



Joseph R. McCrorey  
United States Magistrate Judge  
United States District Court  
District of South Carolina